

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

First Class Mail and Periodicals
Service Standard Changes, 2021

Docket No. N2021-1

AMERICAN POSTAL WORKERS UNION, AFL-CIO
INTERROGATORIES TO ROBERT CINTRON
(APWU/USPS-T-1/1-4)
(May 19, 2021)

Pursuant to 39 CFR §3010.311, the American Postal Workers Union, AFL-CIO respectfully submits the following interrogatories to United States Postal Service witness Robert Cintron (USPS-T-1). These requested admissions should be directed to one or more other witness(es) or answered institutionally as deemed appropriate by the Postal Service.

In accordance with 39 CFR §3010.311 (b) and (c), answers to discovery requests shall be prepared so that they can be incorporated as written cross-examination. Each answer shall begin on a separate page, identify the individual responding and the relevant testimony number, if any, the party who asked the question, and the number and text of the question. Each interrogatory shall be answered separately and fully in writing, unless it is objected to. The reasons for any objection shall be clearly and fully stated. If an objection is made to part of an interrogatory, the part shall be specified. If the Postal Service claims a privilege, it shall identify the specific evidentiary privilege asserted and state the reasons for its applicability. If the Postal Service claims undue burden, it shall state with

particularity the effort that would be required to answer the interrogatory, providing estimates of cost and work hours required, to the extent possible. An interrogatory otherwise proper is not necessarily objectionable because an answer would involve an opinion or contention that relates to fact or the application of law to fact.

Please contact the undersigned with any questions.

Respectfully Submitted,

MURPHY ANDERSON PLLC

A handwritten signature in dark ink, appearing to be 'MH', followed by a horizontal line.

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APWU/USPS-T-1/1

Please refer to page 3 of your testimony. You state that the proposed service standard changes “more realistically align[] the Postal Service’s First-Class Mail service standards with the Postal Service’s operational capabilities in light of declining mail volumes and prior network consolidation and rationalization efforts.”

- (a) Describe in detail how declining mail volumes do not align with the Postal Service’s operational capabilities in ways other than cost and cost-effectiveness.

APWU/USPS-T-1/2

Please refer to page 17, footnote 12 of your testimony. You note that 4% of Election Mail would be affected by these changes.

- (a) Describe in detail the data on which you base your 4% figure.
- (b) Define what types of mail you include in the term “Election Mail”.
- (c) Describe the anticipated impact of these changes on Election Mail for voters who are located outside of the United States, including military personnel who are stationed abroad.

APWU/USPS-T-1/3

Please refer to page 34 of your testimony. You note that the Postal Service has considered the degree of customer satisfaction with Postal Service performance in

the acceptance, processing and delivery of mail and the needs of Postal Service customers, including those with physical impairments.

- (a) Describe how you assessed and measured customer satisfaction as described in your testimony.
- (b) Describe how you assessed and measured postal customers' needs, including those customers with physical impairments.

APWU/USPS-T-1/4

Please refer to page 17, footnote 12 of your testimony. You note that the Postal Service will work with local election officials to help them plan for any impacts from the service standard changes that might affect their Election Mail.

- (a) Identify the secretaries of state and the local election boards whose Election Mail may be impacted by the service standard changes.
- (b) Describe the timing of the Postal Service's work with local election officials about the service standard changes, particularly those local election officials who will be in an election cycle at the time the service standard changes are implemented.
- (c) Describe any operational or business rules regarding Election Mail that will need to be changed or revised to account for the impact of the service standard changes on Election Mail.